IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

Attorney Docket No.: RPS920010005US1

In re Application of:	§
	§
RENGAN ET AL.	§
	§
Serial No.: 09/904,622	§
	§
Filed: 13 JULY 2001	§
	§
For: **DISPLAY PRIVACY FOR**	§
ENHANCED PRESENTATIONS WITH	§
REAL-TIME UPDATES	§

Examiner: NGUYEN, K.

Art Unit: 2677

APPEAL BRIEF

MS Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

The present Brief is submitted in support of the Appeal in the above-identified application.

Please charge Lenovo Corporation Deposit Account 50-3533 in the amount of $500.00 for the submission of the present Brief. No additional fee or extension of time is believed to be required; however, in the event an additional fee or extension of time is required, please charge that fee to Lenovo Corporation Deposit Account 50-3533.

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REAL PARTY IN INTEREST

The present application is assigned to Lenovo Corporation, the real party of interest.

RELATED APPEALS AND INTERFERENCES

No related appeal is presently pending.

STATUS OF THE CLAIMS

Claims 1-7 and 24-37, which were finally rejected by the Examiner as noted in the Final Office Action dated July 13, 2005 and in the Advisory Action dated August 15, 2005, are being appealed.

STATUS OF AMENDMENTS

A Response was submitted on July 22, 2005 in reply to the Final Office Action dated July 13, 2005.

SUMMARY OF THE CLAIMED SUBJECT MATTER

Claim 1 (and similarly in Claims 24 and 31) recites a first memory location being allocated for storing contents to be displayed by a first display device (page 11, lines 21-23; block 406 of Figure 4). The first memory location is accessible by a video display controller (page 9, lines 10-19). In addition, a second memory location is allocated for storing contents to be displayed by a second display device (page 12, lines 17-20; block 418 of Figure 4). Similarly, the second memory location is accessible by the video display controller (page 9, lines 10-19).

In response to a selection of a concurrent display mode, identical information are provided to the first and second memory locations, such that contents displayed on the first display device are identical to contents displayed on the second display device (page 12, lines 2-7; block 414 of Figure 4). In response to a selection of a split display mode, information in the first memory location are retained, and information in the second memory location are updated, such that contents displayed on the first display device are different from contents displayed on the second display device (page 12, lines 15-22; block 422 of Figure 4).

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GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The Examiner's rejection of Claims 1-2, 4, 6-7, 24-25, 27, 29-32, 34 and 36-37 under 35 U.S.C. § 103(a) as being unpatentable over *Chee* (US 5,694,141).

ARGUMENT

The Examiner's rejections of Claims 1-2, 4, 6-7, 24-25, 27, 29-32, 34 and 36-37 are not well-founded and should be reversed.

I.   Neither the '109 patent nor *Chee* teaches the steps of providing identical information and retaining information in response to a selection between the concurrent display mode and the split display mode

Claim 1 (and similarly Claims 24 and 31) recites a step of "in response to a selection of a concurrent display mode, providing identical information to said first and second memory locations, such that contents displayed on said first display device are identical to contents displayed on said second display device," and a step of "in response to a selection of a split display mode, retaining information in said first memory location and updating information in said second memory location, such that contents displayed on said first display device are different from contents displayed on said second display device." Thus, the claimed invention allows identical contents to be simultaneously displayed on a first and second display devices under the concurrent display mode, and allows different contents to be simultaneously displayed on the first display device and the second display device under the split display mode.

The Examiner asserts that the above-mentioned two claimed steps are taught by *Chee*. Specifically, on page 2 of the Final Office Action, the Examiner asserts that the displaying of different contents on two display devices is disclosed by *Chee* in col. 17, lines 45-54. Then on page 3 of the Final Office Action, the Examiner asserts that the displaying of identical contents on two display devices is disclosed by *Chee* in col. 5, lines 24-25.

In col. 5, lines 24-25, *Chee* does state that "both display devices [in the '109 patent] will show the same image." But *Chee* continues to mention that the "'109 patent is not believed to

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relate to the driving of two display devices simultaneously, with each display device showing a different image" (col. 5, lines 25-27). Thus, the '109 patent only teaches the displaying of identical contents on two display devices, but the '109 patent cannot display different contents on the same two display devices. On the other hand, in col. 17, lines 45-54, *Chee* does teach the displaying of different contents on two display devices, but *Chee* does not teach or suggest the displaying of identical contents on the same two display devices.

On page 5 of the Final Office Action, the Examiner provides another specific location in *Chee* (*i.e.*, col. 5, lines 57-59) to support his position that *Chee* teaches the displaying of identical contents on two display devices. Col. 5, lines 57-59 state that *Chee*'s "invention is to provide a video display controller allow two displays to be driven simultaneously, with each display having a different image" (emphasis added). Thus, the additional citation actually supports the Appellants' position of *Chee* only teaches the displaying of different contents on two display devices, and not the Examiner's position of *Chee* also teaches the displaying of identical contents on two display devices.

Basically, the '109 patent only teaches the displaying of identical contents on two display devices, but the '109 patent cannot display different contents on the same two display devices. *Chee* does teach the displaying of different contents on two display devices, but *Chee* does not teach or suggest the displaying of identical contents on the same two display devices. Although each of the cited references teaches one aspect of the claimed invention, none of the cited references teaches the steps of providing identical information and retaining information in response to a selection between the concurrent display mode and the split display mode, respectively. One of ordinarily skilled in art would not be able to provide such selection by simply combining the above-mentioned teachings from the '109 patent with the teachings of *Chee* without any suggestion from one of the references. The Examiner has not provided such suggestion from any of the references. As such, the § 103 rejection is improper.

II.   *Chee* does not teach or suggest the claimed retaining and updating steps

Claim 1 recites "retaining information in said first memory location and updating information in said second memory location."

With respect to the Examiner's assertion that the claimed retaining step is disclosed by *Chee* in col. 17, lines 45-54; even though in col. 17, lines 45-54, *Chee* teaches that different images can be presented on different displays simultaneously, but *Chee* does not teach or suggest that the information in the first memory location are retained and the information in the second memory location are updated, as claimed. Because the claimed invention recites novel features that are not taught or suggested in *Chee*, the § 103 rejection is improper.

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CONCLUSION

For the reasons stated above, Appellants believe that the claimed invention clearly is patentably distinct over the cited references and that the rejections under 35 U.S.C. § 103 are not well-founded. Hence, Appellants respectfully urge the Board to reverse the Examiner's rejection.

Respectfully submitted,

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ATTORNEY FOR APPELLANTS

CLAIMS APPENDIX

1.   A method for providing display control on a computer system having a first display device and a second display device, said method comprising:

allocating a first memory location for storing contents to be displayed by said first display device, wherein said first memory location is accessible by a video display controller;

allocating a second memory location for storing contents to be displayed by said second display device, wherein said second memory location is accessible by said video display controller;

in response to a selection of a concurrent display mode, providing identical information to said first and second memory locations, such that contents displayed on said first display device are identical to contents displayed on said second display device; and

in response to a selection of a split display mode, retaining information in said first memory location and updating information in said second memory location, such that contents displayed on said first display device are different from contents displayed on said second display device.

2.   The method of claim 1, wherein said providing identical information further includes providing information from a frame buffer to said first and second memory locations.

3.   The method of claim 2, wherein said updating information further includes

allocating a second frame buffer; and

providing information from said second frame buffer to said second memory location while providing information from said frame buffer to said first memory location.

4.   The method of claim 1, wherein said providing identical information further includes setting a pointer pointing from a frame buffer to said first and second memory locations.

5.   The method of claim 4, wherein said updating information further includes

allocating a second frame buffer; and

setting a second pointer pointing from said second frame buffer to said second memory location and setting said pointer pointing from said frame buffer to said first memory location.

6.   The method of claim 1, wherein said first display device is external from said computer system and said second display device is internal to said computer system.

7.   The method of claim 1, wherein said selection between said concurrent display mode and said split display mode are made via a soft key function.

8-23.   cancelled.

24.   A computer program product for providing display control on a computer system having a first display device and a second display device, said computer program product comprising:

program code means for allocating a first memory location for storing contents to be displayed by said first display device, wherein said first memory location is accessible by a video display controller;

program code means for allocating a second memory location for storing contents to be displayed by said second display device, wherein said second memory location is accessible by said video display controller;

program code means for providing identical information to said first and second memory locations, in response to a selection of a concurrent display mode, such that contents displayed on said first display device are identical to contents displayed on said second display device; and

program code means for retaining information in said first memory location and updating information in said second memory location, in response to a selection of a split display mode, such that contents displayed on said first display device are different from contents displayed on said second display device.

25.   The computer program product of claim 24, wherein said program code means for providing identical information further includes program code means for providing information from a frame buffer to said first and second memory locations.

26.   The computer program product of claim 25, wherein said program code means for updating information further includes

   program code means for allocating a second frame buffer; and

   program code means for providing information from said second frame buffer to said second memory location while providing information from said frame buffer to said first memory location.

27.   The computer program product of claim 24, wherein said program code means for providing identical information further includes program code means for setting a pointer pointing from a frame buffer to said first and second memory locations.

28.   The computer program product of claim 27, wherein said program code means for updating information further includes

   program code means for allocating a second frame buffer; and

   program code means for setting a second pointer pointing from said second frame buffer to said second memory location and setting said pointer pointing from said frame buffer to said first memory location.

29.   The computer program product of claim 24, wherein said first display device is external from said computer system and said second display device is internal to said computer system.

30.   The computer program product of claim 24, wherein said selections between said concurrent display mode and said split display mode are made via a soft key function.

31.   An apparatus for providing display control on a computer system having a first display device and a second display device, said apparatus comprising:

        means for allocating a first memory location for storing contents to be displayed by said first display device, wherein said first memory location is accessible by a video display controller;

        means for allocating a second memory location for storing contents to be displayed by said second display device, wherein said second memory location is accessible by said video display controller;

        means for providing identical information to said first and second memory locations, in response to a selection of a concurrent display mode, such that contents displayed on said first display device are identical to contents displayed on said second display device; and

        means for retaining information in said first memory location and updating information in said second memory location, in response to a selection of a split display mode, such that contents displayed on said first display device are different from contents displayed on said second display device.

32.   The apparatus of claim 31, wherein said means for providing identical information further includes means for providing information from a frame buffer to said first and second memory locations.

33.   The apparatus of claim 32, wherein said means for updating information further includes

       means for allocating a second frame buffer; and

       means for providing information from said second frame buffer to said second memory location while providing information from said frame buffer to said first memory location.

34.   The apparatus of claim 31, wherein said means for providing identical information further includes means for setting a pointer pointing from a frame buffer to said first and second memory locations.

35.   The apparatus of claim 34, wherein said means for updating information further includes

       means for allocating a second frame buffer; and

       means for setting a second pointer pointing from said second frame buffer to said second memory location and setting said pointer pointing from said frame buffer to said first memory location.

36.   The apparatus of claim 31, wherein said first display device is external from said computer system and said second display device is internal to said computer system.

37.   The apparatus of claim 31, wherein said selections between said concurrent display mode and said split display mode are made via a soft key function.

EVIDENCE APPENDIX

United States Patent number 5,150,109.

RELATED PROCESSINGS APPENDIX

Not applicable.